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19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN FRANCISCO DIVISION**

22 RICHARD KADREY, *et al.*,
23 Individual and Representative Plaintiffs,
24 v.
25 META PLATFORMS, INC., a Delaware
26 corporation;
27 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF MICHELLE WOODHOUSE
IN SUPPORT OF ADMINISTRATIVE MOTION
TO FILE UNDER SEAL JOINT DISCOVERY
LETTER BRIEF AND EXHIBITS**

I, Michelle Woodhouse, hereby declare:

1. I am an Associate General Counsel for Defendant, Meta Platforms, Inc. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. I make this declaration in support of Meta's administrative motion to file under seal the Joint Letter Brief on Meta's Motion to Compel ("Joint Letter Brief") and Exhibits 1, 2, and 4 to the Joint Letter Brief. The motion seeks to have the following partially sealed or entirely sealed:

Document	Sealing Request
Joint Discovery Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit 1 to Joint Discovery Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit 2 to Joint Discovery Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit 4 to Joint Discovery Letter Brief	<ul style="list-style-type: none"> Redacted portions

3. Exhibit 1 comprises excerpts of the deposition transcript of Eleonora Presani, which includes discussion of highly sensitive information regarding Meta's AI development and regarding potential partnerships relating to AI development. Public disclosure of the redacted information exposes Meta to the risk of competitive harm.

4. Exhibit 2 comprises excerpts of the deposition transcript of Melanie Kambadur, which includes discussion of highly sensitive information regarding Meta's AI technical development. Public disclosure of the redacted information exposes Meta to the risk of competitive harm.

5. The Joint Letter Brief contains information quoting and reflecting the contents of Exhibits 1 and 2, as well as the contents of previously sealed ECF Nos. 162-4, 162-5, 162-11, 162-12, 162-13, 162-14 which is discussed in ECF Nos. 161, 161-1, 161-2, and was sealed at ECF No. 172. Public disclosure of the redacted information in the Joint Letter Brief exposes Meta to the risk of competitive harm.

6. Exhibit 4 is Plaintiffs' Rule 30(b)(6) notice, which includes topics that discuss

1 specific information regarding Meta's AI technical development and potential plans that have not
2 been disclosed to the public. Public disclosure of the redacted information exposes Meta to the risk
3 of competitive harm.

4 7. Public disclosure of the information contained in the above-referenced exhibits
5 exposes Meta to the risk of competitive and financial harm, by revealing Meta's non-public
6 business strategies, trade secret information pertaining to its generative AI offerings, and
7 competitive analyses.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct

10 Executed in San Jose, California on this 30th day of September, 2024.

11
12 
13 Michelle Woodhouse